

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
Gloria E. Rodriguez	:	Chapter 13
	:	Case No.: 21-12654-MDC
Debtor(s)	:	

MOTION TO MODIFY PLAN AFTER CONFIRMATION

Debtor, Gloria E. Rodriguez, by and through the undersigned counsel, hereby moves this Honorable Court to Modify their Chapter 13 Plan and in support thereof avers as follows:

1. Debtor filed a Chapter 13 Petition on September 27, 2021.
2. The Chapter 13 Plan was confirmed on March 31, 2022.
3. On February 14, 2022, Debtor's counsel filed a Proof of Claim (#3-1) on behalf of USDA Rural Development in the amount of \$33, 277.00.
4. On September 7, 2022, USDA Rural Development filed a Proof of Claim (#4-1) in the amount of \$41,509.99, requesting a total payoff of the debt.
5. Debtor has paid \$6,123.00 to the Chapter 13 Trustee to date.
6. The Modified Chapter 13 Plan will provide for plan payments in the amount of \$1,185.00 per month for the remaining 47 month for a new base amount of \$61,818.00.
7. The debtor is aware they must remain current on all ongoing obligations to complete the Chapter 13 Plan to avoid potential attempts to dismiss the case by the Trustee or other interested parties.

WHEREFORE, Debtor, by the undersigned counsel, respectfully requests this Honorable Court to enter an Order Modifying the Chapter 13 Plan to include Proof of Claim #4-1.

Dated: November 14, 2022

/s/Brad J. Sadek, Esq.

Brad J. Sadek, Esq.

Attorney for Debtor(s)

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